

EXHIBIT 4

Cassia Court, Camana Bay
Suite 716, 10 Market Street
Grand Cayman, KY1-9006
Cayman Islands
T: +1 345 943 7700

DD: +1 345 [REDACTED]
E: [REDACTED]@forbeshare.com
Our Ref: KY5061-001
Your Ref: JJF/REF/426437.00004



FORBES HARE

By Email

Mr Badr Jafar
Crescent Tower
Buhaira Corniche
PO Box 2222
Sharjah
UAE

14 August 2023

Dear Mr Jafar

Further Request for Documents

We write further to our letter dated 5 May 2023 (the “Letter”), your our client dated 19 May 2023 (the “Email”), the Custodian Summons ruling dated 30 April 2023 (the “Ruling”) and the order of the Honourable Justice Segal made subsequent to the Ruling dated 3 August 2023 (the “Order”). A copy of this order is enclosed with this letter.

We thank you for the provision of the documents (the “Documents”) which are referred to in the Email. Those that are relevant (and not privileged) have now been provided to the Defendants to the litigation by your father as part of the ongoing discovery obligations imposed upon him as a matter of Cayman Islands law.

As you will note, paragraph 1 of the Order obliges your father to discover all documents in your possession, custody and power relating to the negotiating, funding, advance, implementation, restructuring and dealings in respect of the loans that are the subject matter of these proceedings. In light of this, a dispute has arisen between the parties as to the adequacy of the Documents (the “Dispute”).

The specifics of the Dispute are not a matter for this letter. However, in light of (i) the Dispute; (ii) the Ruling; and (iii) the Order, we would request that you undertake the following steps:

- 1) Search (with use of relevant search terms) the totality of your email account held with the Crescent Group and provide all non-privileged documents responsive to paragraph 1 of the Order.
- 2) Search (with use of relevant search terms) all emails held on any other email accounts belonging to you and provide all non-privileged documents responsive to paragraph 1 of the Order.
- 3) Search all hard copy documents held by you and provide all non-privileged hard copy documents responsive to paragraph 1 of the Order.
- 4) Search all data (whether including in 1 and 2 above or otherwise) held on any mobile devices in your possession and provide all non-privileged documents responsive to paragraph 1 of the Order.
- 5) To the extent that data other than that described at 4 above did exist but is no longer accessible, an explanation as to (i) why such data does not exist; and (ii) what steps have been taken to recover the same.

We would note that all documents should be provided pursuant to the terms of the agreed Discovery Protocol provided to you previously, and that all searches should be between the dates of 1 December 2017 and 30 September 2018.

We would be grateful if you could provide the documents and information requested as a matter of urgency.

Finally, we must note all of our client's rights are expressly reserved should the requests above not be complied with.

We thank you for your assistance in advance.

Yours faithfully

A handwritten signature in blue ink, appearing to read "Forbes Hare".

Forbes Hare